



CITY OF PORT ANGELES

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Federal Communications Commission
Office of Managing Director
Washington, D.C. 20554

February 22, 1993

Dear Managing Director,

As the manager of a combined 9-1-1 Dispatch Center and a user of radio frequencies in the Public Safety spectrum, I am very concerned about the proposed FCC docket 92-235.

Our center dispatches for the Port Angeles Police Department, Clallam County Sheriff's Department, Sequim Police Department, Elwah Tribal Police Department and five fire districts. We handle approximately 40,000 dispatches a year and half a million phone calls for police, fire and medical emergencies through the use of 12 frequencies and 35 telephone lines. Our geographic coverage is over 200 square miles of mountainous terrain above the "A" line with Olympic National Park bordering us to the south and the Strait of Juan de Fuca to the north.

We appreciate the fact that the FCC recognizes and is taking steps to alleviate the problems associated with the lack of mobile radio spectrum. However, we have serious concerns with portions of the docket that appear to create more problems for public safety organizations than they solve. Only national defense is ranked higher in priority than public safety communications as established by statute and court decisions. We feel that many sections of this docket have the effect of reducing this priority and, in many cases, public safety communications appear to have become secondary to other users.

Our number one concern is the short term and fast track to comply with the proposed docket. Vendors are not manufacturing equipment that meets the bandwidth requirement of section 88.413 coupled with the fact that needed accessory equipment such as cavities, isolators, combiners, etc. are not manufactured and appear to be beyond the present manufacturing capabilities of vendors. Even if the equipment could be manufactured, there isn't enough time allowed for systems to be purchased, installed and tested to determine if the new equipment and technology will meet the operational needs of public safety users.

Noted for record

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Section 88.429 requires that transmitter power levels be reduced. Some transmitters presently manufactured cannot have the power reduced without creating spurious emissions. Wide area radio systems such as ours would have to add more sites and transmitters to maintain the level of coverage we currently utilize. This equipment would necessitate the

2. Allow a period of time for testing the equipment manufactured to meet docket 92-235 to ensure it will meet the ever changing needs of the public safety environment.
3. Except for the trunking systems reserve bands within the public safety band for police, fire, and emergency medical services.
4. Address the issue of migration that allows for gradual change to the new radio equipment and is more tolerant of dual operation of present and new equipment.
5. Ensure that required paging systems will work with the proposed modulation scheme.
6. Address the wide area coverage needs required by some public safety entities, both for local operations and mutual aid situations.
7. Protect the public safety band from third party and entrepreneur licensees.
8. Ensure the quality of public safety communications will not be sacrificed for the sake of spectrum efficiency.

In conclusion, we feel that docket 92-235 should recognize and make provisions for the unique needs of the public safety service. The need for high quality and reliable communications needed to respond to the public in a rapid and efficient manner should not be compromised. Issues raised by this letter and various papers sent to you by the Associated Public-Safety Communications Officers, Inc. (APCO) on behalf of the public safety organizations in the United States must be addressed.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Naomi L. Wu', written in dark ink.

Naomi L. Wu
Communications Manager